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Board of Vocational Nursing  
and Psychiatric Technicians

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Attorneys for Complainant

**BEFORE THE  
DEPARTMENT OF CONSUMER AFFAIRS  
BUREAU OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**JUAN CORONADO, AKA  
JUAN GABRIEL CORONADO**  
1018 North Roberta Way  
Porterville, CA 93257

Psychiatric Technician License No. PT 32359

Respondent.

Case No. PT-2006-766

**AMENDED**

**ACCUSATION**

Complainant alleges:

**PARTIES**

1. Teresa Bello-Jones, J.D., M.S.N., R.N. ("Complainant") brings this Amended Accusation solely in her official capacity as the Executive Officer of the Bureau of Vocational Nursing and Psychiatric Technicians ("Bureau"), Department of Consumer Affairs.

2. On or about September 13, 2004, the Bureau issued Psychiatric Technician License No. PT 32359 to Juan Coronado, also known as Juan Gabriel Coronado ("Respondent"). The psychiatric technician license was in full force and effect at all times relevant to the charges brought herein and expires on March 31, 2010.

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## STATUTORY PROVISIONS

3. Section 4520 of the Business and Professions Code ("Code") provides, in pertinent part, that the Bureau may discipline any licensed psychiatric technician for any reason provided in Article 3 (commencing with Code section 4520) of the Psychiatric Technicians Law (Code section 4500, et. seq.)

4. Code section 118, subdivision (b) provides, in pertinent part, that the expiration of a license shall not deprive the Bureau of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated. Under Code section 4545, the Bureau may renew an expired license at any time within four years after the expiration.

5. Code section 4521 states, in pertinent part:

The Bureau may suspend or revoke a license issued under this chapter for any of the following reasons:

(i). The use of excessive force upon or the mistreatment or abuse of any patient.

(n) The commission of any act involving dishonesty, when that action is substantially related to the duties and functions of the licensee.

6. Title 16, of the California Code of Regulations, section 2576.6, states, in pertinent part:

### **§ 2576.6. Performance Standards.**

(a) A licensed psychiatric technician shall safeguard patients'/clients' health and safety by actions that include but are not limited to the following:

(b) A licensed psychiatric technician shall adhere to standards of the profession and shall incorporate ethical behavioral standards of professional practice which include but are not limited to the following:

(3) Maintaining professional boundaries with the patient/client;

## COST RECOVERY

7. Code section 125.3 provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation

1 and enforcement of the case.

2 **FIRST CAUSE OF ACTION FOR DISCIPLINE**

3 **(Unprofessional Conduct)**

4 8. Respondent's psychiatric technician license is subject to disciplinary  
5 action under Code section 4521(a), on grounds of unprofessional conduct. While employed at  
6 the Porterville Developmental Center in Porterville, California, as a psychiatric technician, at or  
7 about 2215 on June 8, 2006, Respondent committed unprofessional conduct by engaging in  
8 prohibited contact with a female resident, Angela P, outside of the clinical confines of unit 7 and  
9 in violation of the protocols governing contact between male employees and female residents.  
10 Respondent was observed engaging in contact with Angela P. outside of unit 7 at or about the  
11 time set forth above including but not limited to holding hands, embracing, or other similar  
12 contact. These acts constitute a violation of section 4521 (a) as unprofessional conduct within  
13 the meaning of section 4521 including but not limited to violation of facility Bulletin No. 156  
14 which proscribes in Section 1A engaging in a dual relationship.

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16 **SECOND CAUSE OF ACTION FOR DISCIPLINE**

17 **(Commission of Any Act Involving Dishonesty)**

18 9. Respondent's psychiatric technician license is subject to disciplinary  
19 action under Code section 4521, subsection n, on grounds the Respondent committed an act  
20 involving dishonesty substantially related to the duties of a licensee. During the course of the  
21 investigation of this matter, the Respondent was questioned about leaving the building on June 8,  
22 2006 between 2215 and 2221. Respondent is under a legal obligation to cooperate and respond  
23 to questions from investigators truthfully and completely. When Respondent was questioned  
24 about being outside Unit 7 at or about the times set forth above, Respondent denied being  
25 outside during the times and on the date identified above. The Respondent's security key card  
26 shows the card was used to exit Unit 7 at 2215 and used to reenter at 2221. The Respondent was  
27 physically observed at or about this time by facility security personnel. During the course of the  
28 investigation, Respondent denied losing his security key card on or about the date and time set

1 forth above and denied allowing any one else to use the card. Respondent's failure to respond to  
2 the investigator's questions truthfully constitutes unprofessional conduct within the meaning of  
3 section 4521 (n) and Facility Bulletin 156 section 1 (O) dishonesty in any manner

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5 **PRAYER**

6 **WHEREFORE,** Complainant requests that a hearing be held on the matters  
7 herein alleged, and that following the hearing, the Bureau of Vocational Nursing and Psychiatric  
8 Technicians issue a decision:

- 9 1. Revoking or suspending Psychiatric Technician License No. PT 32359,  
10 issued to Juan Coronado, also known as Juan Gabriel Coronado;  
11 2. Ordering Juan Coronado, also known as Juan Gabriel Coronado, to pay the  
12 Board of Vocational Nursing and Psychiatric Technicians the reasonable costs of the  
13 investigation and enforcement of this case, pursuant to Code section 125.3; and,  
14 3. Taking such other and further action as deemed necessary and proper.

15 DATED: November 7, 2008

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18 TERESA BELLO-JONES, J.D., M.S.N., R.N.  
19 Executive Officer  
20 Bureau of Vocational Nursing and Psychiatric Technicians  
Department of Consumer Affairs  
State of California  
Complainant

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